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September 29, 2020

Hon. Naomi Reice Buchwald
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Via ECF

Re: United Stats v. Domenech

15 Cr. 371 (NRB)

Dear Judge Buchwald.

I am the attorney originally assigned to this case under CJA. I have stayed in touch with Mr. Domenech during his incarceration. My client is now before the Court for a violation of supervised release (VOSR). I was informed of the arrest on the day it occurred, September 17, 2020, by a State public defender and spoke to the defendant's SDNY supervised release officer, George Olivares, as well as Mr. Domenech's family that day. When I was contacted by the Magistrate Clerk the next morning, it was established that I would not be available for the presentment later that day, as I would be travelling, but that the VOSR would be assigned to me once the presentment had been handled by the CJA attorney on duTy. I was then informed that the CJA attorney on duty that day, Sarah Aberg, was assigned the case. I thereafter spoke to Ms. Aberg and eventually to Mr. Domenech who is incarcerated at the Essex County Jail and it was established that he wished me to continue as his counsel for the VOSR. I so informed Ms. Aberg. I have since had several substantive discussions with Mr. Domenech, his mother and sisters and the mother of his child, as well as the Government and Mr. Olivares.

My first request is to have the Court appoint me to the VOSR under CJA, nunc pro tunc to September 17, 2020.

My second request is for a brief adjournment of the conference presently scheduled for October 6, 2020 at 11 am. I am unavailable due my need to attend on that day and time a long-postponed safety valve proffer by an incarcerated defendant arranged by the Government with

the help of Judge Oetken's Chambers. I have spoken to the Government in this case per AUSA Slavik and to Officer Olivares and they do not object. I expect the strong possibility of a disposition on the adjourned date.

Very truly yours,

Bennett M. Epstein

Bennett M. Epstein (electronic signature)

Cc via email to

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MSlavik@usdoj.gov

George_Olivares@nysp.uscourts.gov

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Application granted. Sarah Aberg is relieved as counsel to defendant. The conference presently scheduled for October 6, 2020 at 11a.m. is adjourned.

SO ORDERED.

A handwritten signature in blue ink, reading "Naomi Reice Buchwald", is written over a light blue rectangular stamp.

NAOMI REICE BUCHWALD

UNITED STATES DISTRICT JUDGE

Dated: New York, NY
September 30, 2020